

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

James E. Wright, Jr.	:	
416 Tohickon Avenue	:	
Quakertown, PA 18951	:	2011- CV- 4241
Plaintiff	:	
Vs.	:	
Target National Bank	:	
3901 West 53 <sup>rd</sup> Street	:	
Sioux Falls, SD 57106	:	Jury Trial Demanded
and	:	
John Does 1-10	:	
and	:	
X,Y,Z Corporations	:	
Defendant(s)	:	

**PLAINTIFF'S FIRST AMENDED COMPLAINT**

1. This is an action brought by a consumer for Defendant(s) alleged violations of the Fair Credit Reporting Act (FCRA), 15 USC 1681 et. Seq.
  
2. Plaintiff is JAMES E. WRIGHT, JR., an adult individual whose principle residence is located at 416 TOHICKON AVENUE, QUAKERTOWN, PA 18951.
  
3. Defendants are the following.
  - a. Target National Bank, with a principal place of business, and which may be served at 3901 West 53<sup>rd</sup> Street, Sioux Falls, SD 57106.
  - b. John Does 1-10, individuals or business entities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such Does played a substantial role in the commission of the acts described in this complaint.
  - c. X,Y,Z Corporations, business identities whose identities are not known to Plaintiff at this time, but which will become known upon proper discovery. It is believed and averred that such entities played a substantial role in the commission of the acts described in this complaint.

### **JURISDICTION AND VENUE**

4. The previous paragraphs of this complaint are incorporated by reference and All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint
5. Defendant(s) regularly transact(s) business throughout the Commonwealth of Pennsylvania, and in this jurisdiction.
6. Defendant obtains the benefit(s) of regularly transacting business in this jurisdiction.
7. A substantial portion of the conduct complained of occurred in this jurisdiction.
8. Defendant's principal place of business is located in this jurisdiction.
9. This Court has federal question jurisdiction pursuant to 28 USC 1331, 15 USC 1692, et. seq. and 15 USC 1681 et.seq.
10. Jurisdiction for this action is asserted pursuant to 28 U.S.C. §1334-1337.
11. Venue lies in this District pursuant to 28 U.S.C. §1392(b).
12. Declaratory relief is available pursuant to 28 U.S.C 2201 and 2202.

**COUNT ONE: VIOLATION OF THE FAIR CREDIT REPORTING ACT,  
15 USC 1681 s-2 et seq.; Specifically 15 USC 1681 s-2 (b) et. seq.**

13. The previous paragraphs of this complaint are incorporated by reference and made a part hereof.
14. Plaintiff is a "consumer," as codified at 15 U.S.C. § 1681a(c).
15. Defendant is an entity who, regularly and in the course of business, furnishes information to one or more credit reporting agencies about Defendants(s) transactions or experiences with any consumer and Defendant is a "furnisher," as codified at 15 U.S.C. § 1681s-2.
16. Defendant furnished certain derogatory information about Plaintiff's consumer account to one or more of the relevant credit reporting agencies as defined by FCRA.
17. Plaintiff disputed the alleged account(s) in writing with Defendant(s) in writing for a number of meritorious reasons. Plaintiff's dispute called into question issues including but not limited to the following.
  - a. The amount of the alleged balance for the account.
  - b. Interest.
  - c. Finance charges
  - d. Other fees
  - e. The existence or non-existence of a contract which justified the balance interest, finance charges and other fees.
18. Plaintiff's disputes with Defendant were in writing. See attached exhibits.

19. Plaintiff did not dispute the existence of the account, nor did Plaintiff dispute that Plaintiff was the person to whom such account belonged. But rather, Plaintiff disputed the amount of the balance, interest, finance charges and other fees. See attached exhibits.
20. Plaintiff's disputes with Defendant were bona fide legitimate disputes.
21. Defendant(s) received Plaintiff's disputes concerning the alleged account(s). See attached exhibits.
22. Defendant(s) chose to disregard Plaintiff's disputes, and allowed the information pertaining to the disputed account to remain virtually the same on Plaintiff's credit report.
23. Plaintiff then disputed the alleged account(s) in writing with relevant credit bureaus. See attached exhibits.
24. One or more of the relevant credit reporting agency(ies) then conducted an investigation where Defendant was contacted. See attached exhibits.
25. Defendant verified the alleged account(s) with one or more of the credit reporting agency(ies). See attached exhibits.

26. At the time that Defendant(s) verified the alleged account(s) with the credit reporting agency(ies), Defendant failed to state that the account(s) had been previously disputed by Plaintiff. See attached exhibits.
27. The Pursuant to 15 USC 1861 s-2, Defendant(s) had a duty to notify the relevant credit reporting agency(ies) of Plaintiff's prior dispute of the account(s).
28. The Pursuant to 15 USC 1861 s-2, at the time that Defendant(s) verified the information to the credit reporting agency(ies), Defendant(s) had a duty to report to the credit reporting agency(ies) that the account(s) in question had been previously disputed by Plaintiff.
29. At the time that Defendant(s) verified the information to the credit reporting agency(ies), Defendant failed to inform the relevant credit reporting agency(ies) that the account had been disputed by Plaintiff.
30. Defendant failed to fulfill it's duties prescribed by 15 USC 1681 s-2 to inform the credit reporting agency(ies) that Plaintiff had previously disputed the account(s). See attached exhibits.
31. Defendant(s) deprived Plaintiff of Plaintiff's right to have the disputed status of the account(s) included on Plaintiff's credit report.

32. Defendant(s) failure to notify the relevant credit reporting agency(ies) of Plaintiff's legitimate, bona fide and meritorious disputes was misleading in such a way that such failure can be expected to influence any potential creditor or employer who would happen to review Plaintiff's credit report. See Saunders v. Branch Banking and Trust Company of Virginia, 526 F 3d 142, 151 (4<sup>th</sup> Cir. 2008).
33. Defendant(s) failure to notify the relevant credit reporting agency(ies) of Plaintiff's disputes fosters a presumption of validity to potential creditors or employers.
34. The inclusion of the fact that the account(s) had previously been disputed by Plaintiff would likely help to negate such a presumption.
35. Any potential creditor or may well be curious as to why Plaintiff did not pay on the account. A potential creditor or employer may be influenced to learn that the non-paid account was in dispute, thereby possibly warranting Plaintiff's non-payment of the account.
36. Defendant(s) failure to notify the relevant credit reporting agency(ies) of Plaintiff's Legitimate, meritorious and bona fide dispute(s) is misleading in such a way that such failure can be expected to have an adverse affect. See Saunders v. Branch Banking and Trust Company of Virginia, 526 F 3d 142, 151 (4<sup>th</sup> Cir. 2008).

37. Upon information and belief, it is averred that Defendant has a standard practice policy which contradicts it's duties pursuant to 15 USC 1681 s-2.
38. It is believed and averred that Defendant's failure to comply with 15 USC 1681 s-2 was intentional.
39. In the alternative, it is believed and averred that Defendant's failure to comply with 15 USC 1681 s-2 was based on reckless indifference to the possibility that Plaintiff may well have been correct in disputing certain aspects of the account information contained on his credit report.
40. In the alternative, it is believed and averred that Defendant's failure to comply with 15 USC 1681 s-2 was based on negligent indifference to the possibility that Plaintiff may well have been correct in disputing certain aspects of the account information contained on his credit report.
41. In the alternative, it is believed and averred that Defendant's failure to comply with 15 USC 1681 s-2 was based on reckless indifference to Defendant(s) duties under 15 USC 1681 s-2.

42. In the alternative, it is believed and averred that Defendant's failure to comply with 15 USC 1681 s-2 was based on negligent indifference to Defendant(s) duties under 15 USC 1681 s-2.

### **PRIVATE CAUSE OF ACTION**

43. The previous paragraphs of this complaint are incorporated by reference.
44. Plaintiff brings this action under 15 USC 1681 s-2(b), as distinguished from 15 USC 1681s-2(a).
45. There is no private cause of action under 15 USC 1681s-2(a). Only the government can bring a cause of action under 15 USC 11681 s-2(a). For example, the Attorney General could bring a claim on behalf of consumers under 15 USC 1681s-2(a).
46. But there is a private cause of action under 15 USC 1681s-2(b). See the following case law which distinguishes between the government right of action under 15 USC 1681s-2(a), and the private cause of action under 15 USC 1681s-2(b).

Marshall v. Swift River Academy, LLC, 2009 WL 1112768 (9th Cir. 2009).

A consumer has no private right of action under FCRA against furnisher merely because the furnisher failed to provide accurate information to consumer reporting agencies.



Beisel v. ABN Ambro Mortgage, Inc., No. 07-2219, 2007 WL2332494, \*1 (E.D. Pa. Aug. 10, 2007).

In order to prevail on a FCRA claim Plaintiff “must prove [he] notified a credit reporting agency of the dispute, the credit reporting agency then notified the furnisher of information, and the furnisher of information failed to investigate or rectify the disputed charge.”).

Catanzaro v. Experian Information Solutions, Inc., 671 F. Supp.2d 256, 260 (D. Mass. 2009).

Notification by a consumer reporting agency to the furnisher is a prerequisite for furnisher liability under FCRA.

Kaetz v. Chase Manhattan Bank, 2007 WL 1343700, \*3 (M.D. Pa. 2006). The Court dismissed Plaintiff’s Complaint, but only because Plaintiff failed to allege that he disputed the accuracy of the debt to a credit agency, or that the credit agency thereafter reported dispute to defendant.

47. Because Plaintiff first disputed the account(s) with Defendant(s), and then disputed the account with the credit reporting agency afterwards, and then Defendant verified the derogatory information to the Credit Reporting Agency without stating that the account was in a “disputed” status, Plaintiff does have a private cause of action against Defendant under these particular circumstances.
48. It is believed and averred that Defendant has standard business practices antithetical to its duties under 15 USC 1681 s-2.

### **LIABILITY**

49. The previous paragraphs of this complaint are incorporated by reference and made a part hereof .
50. At all times various employees and / or agents of Defendant were acting as agents of Defendant, and therefore Defendant is liable to for the acts committed by its agents and / or employees under the doctrine of respondeat superior.
51. At all times various employees and / or agents of Defendant were acting as agents of Defendant, and therefore Defendant is liable to Plaintiff for the acts committed by its agents and / or employees under the theory of joint and several liability because Defendant and its agents were engaged in a common business venture and were acting jointly and in concert.

## **DAMAGES**

52. The preceding paragraphs are incorporated by reference and made a part hereof.
53. Plaintiff's actual damages are \$1.00 more or less, including but not limited to postage, phone calls, fax, gas, mileage, etc.
54. \$1,000.00 statutory damages under 15 USC 1681 et. seq.
55. Plaintiff suffered some distress and anger as a result of his rights being violated by Plaintiff and the rights of other consumers.
56. The value of Plaintiff's emotional distress shall be proven at trial.
57. Plaintiff believes and avers that for purposes of a default judgment, his distress has a Dollar value of no less than \$5,000.00.
58. Plaintiff believes and avers that the acts committed by Defendant are willful, wanton intentional, or reckless at best. Plaintiff believes and avers that Defendant's acts are systemic. Therefore, punitive damages are warranted.
59. Plaintiff believes and avers that punitive damages should be awarded to Plaintiff in the amount of no less than \$20,000.

60. Plaintiff believes and avers that Plaintiff is entitled to reasonable attorney fees of \$1,925 at a rate of \$350.00 per hour, described below.

a. Consultation with client and review of file. Drafting of disputes. Organizing documents.	2 hour
b. Drafting of writ and related documents	.25
c. Drafting , editing, review and filing of compliant and amended complaint related documents	1
d. Service of Process	.25
e. Follow up correspondence with Defense	2

= 5.5

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\$1,925

Total

61. Plaintiff's attorney fees continue to accrue as the case moves forward.

### INJUNCTIVE RELIEF

62. The previous paragraphs of this Complaint are incorporated by reference.

63. Plaintiff requests an order from this honorable court directing Defendant to report Plaintiff's account(s)(s) referred to in the attached exhibits as "disputed," in accordance with 15 USC 1681 s-2, or not to report the account(s) at all.

### OTHER RELIEF

64. The previous paragraphs of this Complaint are incorporated by reference.
65. Plaintiff requests such other relief as this court may deem just and proper.

### JURY TRIAL

66. Plaintiff requests and demands a jury trial in this matter.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of \$27,926 enumerated as follows.

\$1.00 actual damages  
\$1,000.00 statutory damages,  
\$1,925 attorney fees  
\$5,000 emotional distress  
\$20,000 punitive damages

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\$27,926

Wherefore, Plaintiff seeks declarative relief and in injunction requiring Defendant to comply with 15 USC 1681 s-2. Plaintiff seeks such other relief as this Court deems fair and just.

Vicki Piontek

Vicki Piontek, Esquire  
Attorney for Plaintiff  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
Fax: 866-408-6735  
[palaw@justice.com](mailto:palaw@justice.com)

7.22.2011

Date

# **EXHIBITS**

**James E. Wright, Jr.**  
416 Tohickon Avenue  
Quakertown, PA 18951  
215-538-3676

TNB-Visa  
P.O. Box 673  
Minneapolis, MN 55440

By Certified U.S. Mail

Re: **DISPUTE**  
**James E. Wright, Jr. SSN: XXX-XX-XXXX**  
**Account Number 4352371725228671**  
**Alleged Balance \$4,556**

To Whom it May Concern:

Your company has placed derogatory information on my credit report for the above referenced account.

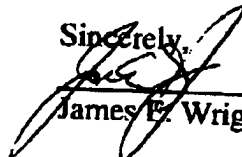
The balance that your company claims against me is comprised largely of interest, finance charges, penalties or other fees not justified by any existing contract.

The amount stated on my credit report is excessive and inflated. I request proof of the contract justifying such charges. I also would like proof of the balance and a breakdown of all charges.

I have never been provided a copy of the contract which proves the interest rate, finance charges, late fees and other penalties. I dispute such amounts and believe that the actual balance, if any, is much lower than the amount stated on my credit report.

**THIS IS A DISPUTED ACCOUNT. YOU MUST MARK THIS ACCOUNT AS DISPUTED ON MY CREDIT REPORT.**

Sincerely,

  
James E. Wright, Jr.

11-29-10  
Date

EXHIBIT A-1

SENDER COMPLETE THIS SECTION		RECIPIENT COMPLETE THIS SECTION (IF DELIVERED)	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>TN B-Visa PO Box 673 Minneapolis, MN 55440</p>		<p>A. Signature X <i>Wah</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery DEC 06 2010</p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: _____</p>	
<p>2. Article Number (Transfer from ex) 7010 1060 0000 4058 3674</p>		<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.         </p>	
<p>PS Form 3811, February 2004</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
Domestic Return Receipt		102583-02-M-1540	

EXHIBIT A-2

DEC-21-2010 07:05 AM JAMES.WRIGHT

215 538 6128

P.01





\*10G0H\*

VGS-14-01-00001262

JAMES E WRIGHT  
416 TOHICKON AVE  
QUAKERTOWN PA 18951-1343

January 13, 2011

**Target Visa Credit Card Account History**

Dear James E Wright,

We reviewed our records for your Target Visa Credit Card and confirmed that the information we've sent the credit bureaus about your account is correct. If you disagree with this decision you can call us at (888) 755-5856. You can also get in touch with the bureaus directly for more information:

Trans Union Consumer Relations  
2 Baldwin Place  
P.O. Box 1000  
Chester, PA 19022-1373  
(800) 888-4213

Experian  
701 Experian Parkway  
P.O. Box 2002  
Allen, TX 75013-0036  
(888) 397-3742

Equifax Information Services  
P.O. Box 740241  
Atlanta, GA 30374-0241  
(800) 685-1111

Innovis  
Attn: Consumer Assistance  
P.O. Box 1689  
Pittsburgh, PA 15230-1689  
(800) 540-2505

Thanks for getting in touch with us about the account. We hope you'll visit Target® soon.

Sincerely,  
Target Financial Services

Target and Target Credit Card are registered trademarks of Target Brands, Inc., and Visa is a registered trademark of Visa. All rights reserved. Target Visa Credit Card is issued by Target National Bank pursuant to a license from Visa U.S.A. Inc. REDcard®: Target Credit Card and Target Visa Credit Card.

**NOTICE**

The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided that the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is the Office of the Comptroller of the Currency, Customer Assistance Group, 1301 McKinney Street, Suite 3450, Houston, TX 77010-9050. The Ohio laws against discrimination require that all creditors make credit equally available to all creditworthy customers, and that credit reporting agencies maintain separate credit histories on each individual upon request. The Ohio Civil Rights Commission administers compliance with this law. Washington state law against discrimination prohibits discrimination in credit transactions because of race, creed, color, national origin, sex or marital status. The Washington State Human Rights Commission administers compliance with this law.

**Target National Bank**

3901 West 53rd Street, Sioux Falls, SD 57106-4216

RTNG02

Acct ID: 00030778671

EXHIBIT B

**James E. Wright, Jr.**  
**416 Tohickon Avenue**  
**Quakertown, PA 18951**  
**215-538-3676**

**Target National Bank**  
**P.O. Box 673**  
**Minneapolis, MN 55440**

**By Certified U.S. Mail**

**Re: DISPUTE AND REQUEST FOR INVESTIGATION**  
**James E. Wright, Jr. SSN: [REDACTED]**  
**Account Number 435237172522**  
**Alleged Balance \$4,556**

**To Whom it May Concern:**

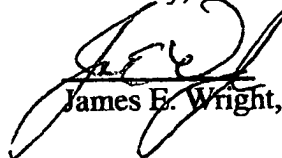
Your company has placed derogatory information on my credit report for the above referenced account. The balance that your company claims against me is comprised largely of interest, finance charges, penalties or other fees not justified by any existing contract.

The amount stated on my credit report is excessive and inflated. I request proof of the contract justifying such charges. I also would like proof of the balance and a breakdown of all charges.

I have never been provided a copy of the contract which proves the interest rate, finance charges, late fees and other penalties. I dispute such amounts and believe that the actual balance, if any, is much lower than the amount stated on my credit report.

**THIS IS A DISPUTED ACCOUNT. YOU MUST MARK THIS ACCOUNT AS DISPUTED ON MY CREDIT REPORT.**

Sincerely,

  
James E. Wright, Jr.

1-25-11  
Date

7010 0290 0002 2743 5576

U.S. Postal Service	
<b>CERTIFIED</b>	
(Domestic Mail Only; Insurance Coverage)	
For delivery information visit our website at <a href="http://usps.com">usps.com</a>	
Postage	\$
Certified Fee	\$
Return Receipt Fee (Endorsement Required)	\$
Restricted Delivery Fee (Endorsement Required)	\$
Total Postage & Fees	\$
Sent To	
Target National	
Box Box 673	
Minneapolis	
PS Form 3800, August 2006	

EXHIBIT C-1



[Home](#) | [Help](#) |  
[Sign In](#)

[Track & Confirm](#)

[FAQs](#)

## Track & Confirm

### Search Results

Label/Receipt Number: 7010 0290 0002 2743 5576  
Status: **Delivered**

Your item was delivered at 6:05 am on February 10, 2011 in  
MINNEAPOLIS, MN 55440. A proof of delivery record may be available  
through your local Post Office for a fee.

Additional information for this item is stored in files offline.

### Track & Confirm

Enter Label/Receipt Number.

[Go >](#)

[\(Restore Offline Details >\)](#) [?](#) [\(Return to USPS.com Home >\)](#)

[Site Map](#)

[Customer Service](#)

[Forms](#)

[Gov't Services](#)

[Careers](#)

[Privacy Policy](#)

[Terms of Use](#)

[Business Customer Gateway](#)

Copyright© 2010 USPS. All Rights Reserved.

No FEAR Act EEO Data

FOIA



United States  
Post Office, Inc.



United States  
Post Office, Inc.

EXHIBIT C-2

MAY-03-2011 02:22 PM JAMES.WRIGHT

215 538 6128

P.01

**EQUIFAX****CREDIT FILE : April 26, 2011**  
**Confirmation # 1103047850**

Dear James E Wright:

Your request for Equifax to reinvestigate certain items of your credit file is now complete.

Below are your results and a report of your credit file revised, as applicable, as a result of the reinvestigation. If you have additional questions regarding the reinvestigated items, please contact the source of that information directly. You may also contact Equifax regarding the specific information contained within this letter or report within the next 60 days by visiting us at [www.investigate.equifax.com](http://www.investigate.equifax.com).

Thank you for giving Equifax the opportunity to serve you.

**The Results Of Our Reinvestigation**>>> We have reviewed your concerns and our conclusions are:  
Once an acct has been opened, the acct may appear on the credit file for 7 or 10 years from the date of last activity.**Credit Account Information**(For your security, the last 4 digits of account number(s) have been replaced by X)  
(This section includes open and closed accounts reported by credit grantors)

Account History	Status Code	Descriptions
1 : 30-59 Days Past Due	5 : 150-179 Days Past Due	J : Voluntary Surrender
2 : 60-89 Days Past Due	6 : 180 or More Days Past Due	K : Repossession
3 : 90-119 Days Past Due	G : Collection Account	L : Charge Off
4 : 120-149 Days Past Due	H : Foreclosure	

>>> We have researched the credit account. Account # - 435237172522\* The results are: This creditor has verified to Equifax that the prior paying history is being reported correctly. This creditor has verified to Equifax that the current status is being reported correctly. The balance of this item has been updated. Additional information has been provided from the original source regarding this item. If you have additional questions about this item please contact: **Target National Bank, C/O Target Credit Services, Minneapolis MN 55440-9475****Target National Bank C/O TARGET CREDIT SERVICES Minneapolis MN 55440-9475**

Account Number	Date Opened	High Credit	Credit Limit	Terms Duration	Terms Frequency	Months Paid	Activity Designator	Credit Description
435237172522*	02/2007	\$0	\$3,800			48		
Items As of	Balance	Amount	Amount	Date of	Amount	Amount	Amount	Amount
04/2011	\$4,557	\$4,557	\$4,557	08/2009	\$100	\$0	09/2009	\$0
Status - Charge Off: Type of Account - Revolving: Type of Loan - Credit Card: Whose Account - Individual Account: ADDITIONAL INFORMATION - Charged Off Account: Account Closed By Credit Grantor: Credit Card:								
Account History	03/2010							
with Status Codes	L							

(Continued On Next Page)

001276

Quakerstown, PA 18951-1343  
416 Tohickon Ave  
James E Wright  
000963955-1276P.O. Box 105518  
Atlanta, GA 30348

EXHIBIT D

\*\*\* 236408935-005 \*\*\*

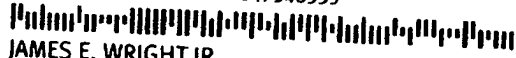
PO Box 2000

Chester, PA 19022



05/06/2011 TransUnion.

P11CNH00200976-1003901-047546333



JAMES E. WRIGHT JR.

416 TOHICKON AV

QUAKERTOWN, PA 18951

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last one year for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit <http://transunion.com/consumerfaq>.

### Investigation Results

ITEM	DESCRIPTION	RESULTS
PERSONAL INFORMATION		
TNB-VISA	...	NEW INFORMATION BELOW
	# 435237172522****	DELETED
		NEW INFORMATION BELOW
		NEW INFORMATION BELOW
		NEW INFORMATION BELOW
		NEW INFORMATION BELOW
		NEW INFORMATION BELOW

EXHIBIT E-1

File Number: 236408935  
 Page: 1 of 2  
 Date Issued: 05/06/2011

  
 TransUnion.

## Personal Information

Name: JAMES E. WRIGHT JR.

You have been on our files since 10/1986

SSN: XXX-XX-4036  
 Date of Birth: 09/1963  
 Your SSN is partially abbreviated for your protection.

## CURRENT ADDRESS

Address: 416 TOHICKON AV  
 QUAKERTOWN, PA 18951  
 Date Reported: 02/1999

## PREVIOUS ADDRESS

Address: 14 WILLIAM RD B  
 KINTNERSVILLE, PA 18930  
 Date Reported: 01/1999

## EMPLOYMENT DATA REPORTED

Employer Name: SELF EMPLOYED  
 Date Verified: 12/2008

Position: OWNER  
 Hired:

Employer Name: CONTRACTOR  
 Date Verified: 05/2008

Position: INDEPENDANT HOME  
 Hired: 05/2006

Employer Name: CORRUGATED PAPER GRO  
 Date Reported: 11/2005

Position:  
 Hired:

Employer Name: GEORGIA PACIFIC  
 Date Reported: 05/2005

Position:  
 Hired:

Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

## Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them.

N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

## Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending on your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors.

Loan Type: CHARGE ACCOUNT

Remarks: ACCT CLOSED BY CREDIT GRANTOR

Estimated date that this item will be removed: 08/2016

Balance:  
 Date Verified:  
 High Balance:  
 Credit Limit:  
 Past Due:

Pay Status:  
 Account Type:  
 Responsibility:  
 Date Open:  
 Date Closed:

Consumer Credit Report for JAMES E. WRIGHT JR.

File Number: 236408935  
 Page: 2 of 2  
 Date Issued: 05/06/2011

[REDACTED]

Balance: [REDACTED]  
 Date Verified: [REDACTED]  
 High Balance: [REDACTED]  
 Collateral: [REDACTED]  
 Credit Limit: [REDACTED]

Pay Status: [REDACTED]  
 Account Type: [REDACTED]  
 Responsibility: [REDACTED]  
 Date Open: [REDACTED]  
 Date Closed: [REDACTED]  
 Date Paid: [REDACTED]

Loan Type: CREDIT CARD  
 Remarks: DISPUTE RESLVD-CUST DISAGREES  
 Estimated date that this item will be removed: 09/2016

[REDACTED]

Balance: [REDACTED]  
 Date Verified: [REDACTED]  
 High Balance: [REDACTED]  
 Collateral: [REDACTED]  
 Credit Limit: [REDACTED]

Pay Status: [REDACTED]  
 Account Type: [REDACTED]  
 Responsibility: [REDACTED]  
 Date Open: [REDACTED]  
 Date Closed: [REDACTED]  
 Date Paid: [REDACTED]

Loan Type: [REDACTED]  
 Remark: [REDACTED]  
 Estimated date that this item will be removed: [REDACTED]

[REDACTED]

Balance: [REDACTED]  
 Date Verified: [REDACTED]  
 Original Amount: [REDACTED]  
 Original Creditor: [REDACTED] NEVADA N A  
 Past Due: [REDACTED]

Pay Status: [REDACTED]  
 Account Type: [REDACTED]  
 Responsibility: [REDACTED]

TNB-VISA #435237172522\*\*\*\*

POB 673  
 MINNEAPOLIS, MN 55440-0673  
 (888) 755-5856

Balance: \$4,557  
 Date Verified: 04/2011  
 High Balance: \$4,557  
 Credit Limit: \$3,800  
 Past Due: >\$4,557<

Pay Status: XCHARGED OFF AS BAD DEBT  
 Account Type: REVOLVING ACCOUNT  
 Responsibility: INDIVIDUAL ACCOUNT  
 Date Open: 02/2007  
 Date Closed: 03/2010

Loan Type: CREDIT CARD  
 Remarks: ACCT CLOSED BY CREDIT GRANTOR  
 Estimated date that this item will be removed: 08/2016

- End of Investigation results -

To view a free copy of your full, updated credit file, go to our website <http://disclosure.transunion.com>

EXHIBIT E-3

P 11CNH-002 00976-1003904 04/04

**James Wright**  
**416 Tohickon Avenue- Quakertown, PA 18951**  
**267-373-9736**

Equifax Information Services  
P.O. Box 740241  
Atlanta, GA 30374

**Re: DISPUTE AND REQUEST FOR INVESTIGATION**  
**James Wright [REDACTED]**  
**Target National Bank**  
**Account Number 435237172522**  
**Alleged High Balance \$4,556**

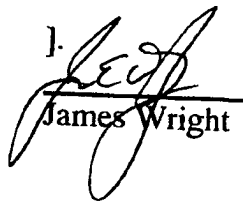
To Whom it May Concern:

I wish to dispute the above referenced account. The balance is excessive and inflated and not warranted by any existing contract.

I request proof of the alleged debt, and a contract which proves the balance, fees, interest, etc.

Furthermore, I never signed a contract for this account. This account is not my account. I was listed as an authorized user on my wife's account. It is not mine. I never signed or agreed to anything.

Sincerely,

1.   
James Wright

5-5-11  
Date

EXHIBIT F



**James Wright**  
**416 Tohickon Avenue Quakertown, PA 18951**  
**267-373-9736**

Experian Information Services  
P.O. Box 2002  
Allen, TX 75013

**Re: DISPUTE AND REQUEST FOR INVESTIGATION**  
**James Wright [REDACTED]**  
**Target National Bank**  
**Account Number 435237172522**  
**Alleged High Balance \$4,556**

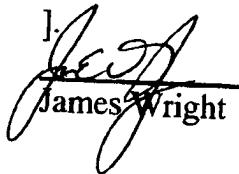
To Whom it May Concern:

I wish to dispute the above referenced account. The balance is excessive and inflated and not warranted by any existing contract.

I request proof of the alleged debt, and a contract which proves the balance, fees, interest, etc.

Furthermore, I never signed a contract for this account. This account is not my account. I was listed as an authorized user on my wife's account. It is not mine. I never signed or agreed to anything.

Sincerely,

  
James Wright

5-5-11  
Date

EXHIBIT G

**James Wright**  
**416 Tolickon Avenue- Quakertown, PA 18951**  
**267-373-9736**

Trans Union Corporation  
P.O. Box 1000  
Chester, PA 19022

**Re: DISPUTE AND REQUEST FOR INVESTIGATION**  
**James Wright [REDACTED]**  
**Target National Bank**  
**Account Number 435237172522**  
**Alleged High Balance \$4,556**

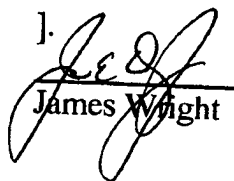
To Whom it May Concern:

I wish to dispute the above referenced account. The balance is excessive and inflated and not warranted by any existing contract.

I request proof of the alleged debt, and a contract which proves the balance, fees, interest, etc.

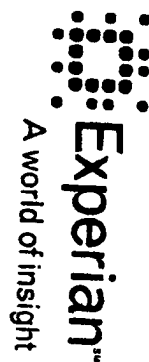
Furthermore, I never signed a contract for this account. This account is not my account. I was listed as an authorized user on my wife's account. It is not mine. I never signed or agreed to anything.

Sincerely,

1.   
James Wright

5-5-11  
Date

EXHIBIT H



Prepared for: JAMES E WRIGHT JR  
Date: May 10, 2011  
Report number: 1502-8933-04

Page 1 of 4

Dear JAMES E WRIGHT JR,

To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.

TARGET NATIONAL BANK  
435237172522....  
PLEASE CONTACT CREDIT GRANTOR AT -8887555856-

According to the Fair Credit Reporting Act (FCRA), a national consumer credit reporting company's role in the dispute process is to investigate information to determine the accuracy and completeness of any disputed item by contacting the source of the disputed information and informing them of all relevant information regarding the consumer's dispute. If the issue is not resolved, then the consumer credit reporting company must offer to include a consumer statement on the personal credit report. The Federal Trade Commission (the government agency charged with enforcement of the FCRA) does not require that the consumer credit reporting company obtain documentation such as the actual signed sales slips, signature cards, contracts, etc., nor does it require that consumer credit reporting companies act as mediators or negotiators in account disputes.

Sincerely,

Experian  
NCAC  
P.O. Box 2002  
Allen TX 75013

PO Box 9701  
Allen, TX 75013



0002711 01 MB 0 387 AUTO 1 0 7167 18951-134316 -C01-P02713-I

JAMES E WRIGHT JR  
416 TOHICKON AVE  
QUAKERTOWN PA 18951-1343



0156888971

EXHIBIT

I-1



Prepared for: JAMES E WRIGHT JR  
Date: May 10, 2011  
Report number: 1502-8933-04

**Dispute results**

**About our dispute process**

This summary shows the revision(s) made to your credit file as a result of our processing of your dispute. If you still question an item, then you may want to contact the furnisher of the information directly or review the original information in the public record.

- The federal Fair Credit Reporting Act provides that you may:
- request a description of how we processed your dispute, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number if reasonably available;
  - add a statement disputing the accuracy or completeness of the information; and
  - request that we send these results to organizations who have requested your credit report in the past two years for employment purposes or six months for any other purpose.
- If no information follows, our response appeared on the previous page.

**How to read your results**

- Deleted** - This item was removed from your credit report
- Remains** - This item was not changed as a result of our processing of your dispute
- Updated** - A change was made to this item; review this report to view the change. If ownership of the item was disputed, then it was verified as belonging to you
- Investigated** - This item was either updated or deleted; review this report to learn its outcome

**Results**

We completed investigating any items you disputed with the sources of the information and processed any other requests you made. Here are the results:

Credit items	Outcome
TARGET NB 435237172522....	Updated

Still pending	Projected completion date
---------------	---------------------------

[REDACTED]

Visit [experian.com/status](http://experian.com/status) to check the status of your pending disputes at any time

**Additional information**

To view a full copy of your corrected credit report, visit [experian.com/viewreport](http://experian.com/viewreport)

- ☐ To receive a copy by mail, check this box and within 30 days return this original page to P.O. Box 9701, Allen, TX 75013.
- Copies will not be accepted.

**What's your credit score?**

Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

0158888971



EXHIBIT I-2

Page 3 of 4

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments and most public record items may remain on the credit report for up to seven years, except Chapters 7, 11 and 12 bankruptcies and unpaid tax liens, which may remain for up to 10 years. A paid tax lien may remain for up to seven years. Transferred accounts that have not been paid due remain up to 10 years after the date the account was transferred.

**TARGET NATIONAL BANK**  
PO BOX 673  
MINNEAPOLIS MN 55440  
Phone number  
(888) 755-5856  
Partial account number  
43523717252.....  
Address identification number  
0039164528

Date opened	Type	Credit limit or original amount	Recent balance
Feb 2007	Credit card		\$4,557 as of May 2011
First reported Mar 2010	Terms	\$3,800	
Mar 2010	Not reported	High balance	
Date of status Mar 2010	Monthly payment	\$4,557	Recent payment \$100
	Not reported		

**Recent balance**  
**\$4,557 as of May**  
**2011**  
**Recent payment**  
**\$100**

UK	Current/Terms of agreement met	VS	Voluntarily surrendered
30	Account 30 days past due	R	Repossession
60	Account 60 days past due	PBC	Paid by creditor
90	Account 90 days past due	IC	Insurance claim
120	Account 120 days past due	G	Claim filed with government
150	Account 150 days past due	D	Defaulted on contract
180	Account 180 days past due	C	Collection
CRD	Creditor received deed	CO	Charge off
FS	Foreclosure proceedings started	CLS	Closed
F	Foreclosed	ND	No data for this time period

**Individual Status**

Account charged off. \$4,557 written off. \$4,557 past due as of May 2011.

2016. The record is scheduled to continue on record until June 2016.

### Creditor's statement

Account closed at credit grantor's request." This item was verified.

This item was verified and updated on May 2011.

[illegible]

**Account history** - If your creditor reported your account balances to us, we list the original loan amount for an installment loan. This section also includes the

**AB** = Account balance (\$) **OPR** = Date payment received

**S-P** = Scheduled payment amount (\$)

[illegible][illegible]

Between May 2000 and May 2001

On 12/31/2017, your credit limit/high balance was \$3,800

\_\_\_\_\_

**0158888971**

0158888971

EXHIBIT

I 3

File Number: 237722490  
Page: 1 of 1  
Date Issued: 05/19/2011

TransUnion.

Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

## Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them:

N/A	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

## Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending on your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors.

### TNB-VISA #435237171262\*\*\*\*

POB 673  
MINNEAPOLIS, MN 55440-0673  
(888) 755-5856

Loan Type: CREDIT CARD

Remarks: ACCT CLOSED BY CREDIT GRANTOR

Estimated date that this item will be removed: 08/2016

Balance: \$2,852  
Date Verified: 05/2011  
High Balance: \$2,852  
Credit Limit: \$2,500  
Past Due: \$2,852

Pay Status: CHARGED OFF AS BAD DEBT  
Account Type: REVOLVING ACCOUNT  
Responsibility: INDIVIDUAL ACCOUNT  
Date Open: 10/2005  
Date Closed: 03/2010

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website <http://disclosure.transunion.com>

EXHIBIT J

\*\*\* 236408935-014 \*\*\*  
 PO Box 2000  
 Chester, PA 19022



06/09/2011 TransUnion.

P1JVFT00200814-I003253-053943372



JAMES E. WRIGHT JR.  
 416 TOHICKON AV  
 QUAKERTOWN, PA 18951

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last one year for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of any company we may have contacted for information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit  
<http://transunion.com/consumerfaqs>.

### Investigation Results

ITEM	DESCRIPTION	RESULTS
PERSONAL INFORMATION		NEW INFORMATION BELOW
TNB-VISA	# 435237172522****	VERIFIED, NO CHANGE

EXHIBIT K-1

File Number: 236408935  
Page: 1 of 2  
Date Issued: 06/09/2011



### Personal Information

Name: JAMES E. WRIGHT JR.

You have been on our files since 10/1986

SSN: XXX-XX-4036  
Date of Birth: 09/1963  
Your SSN is partially abbreviated for your protection.

### CURRENT ADDRESS

Address: 416 TOHICKON AV  
QUAKERTOWN, PA 18951  
Date Reported: 02/1999

### PREVIOUS ADDRESS

Address: 14 WILLIAM RD B  
KINTNERSVILLE, PA 18930  
Date Reported: 01/1999

### EMPLOYMENT DATA REPORTED

Employer Name: SELF EMPLOYED  
Date Verified: 12/2008

Position: OWNER  
Hired:

Employer Name: CONTRACTOR  
Date Verified: 05/2008

Position: INDEPENDANT HOME  
Hired: 05/2006

Employer Name: CORRUGATED PAPER GRO  
Date Reported: 11/2005

Position:  
Hired:

Employer Name: GEORGIA PACIFIC  
Date Reported: 05/2005

Position:  
Hired:

Special Notes: If any item on your credit report begins with 'MED1', it includes medical information and the data following 'MED1' is not displayed to anyone but you except where permitted by law.

### Account Information

The key to the right helps explain the payment history information contained in some of the accounts below. Not all accounts will contain payment history information, but some creditors report how you make payments each month in relation to your agreement with them.

N/A	X	OK				
Not Applicable	Unknown	Current	30 days late	60 days late	90 days late	120 days late

### Adverse Accounts

The following accounts contain information which some creditors may consider to be adverse. Adverse account information may generally be reported for 7 years from the date of the first delinquency, depending on your state of residence. The adverse information in these accounts has been printed in brackets or is shaded for your convenience, to help you understand your report. They are not bracketed or shaded this way for creditors.

#### CAPITAL ONE BANK USA NA #517805262427\*\*\*\*

PO BOX 30281  
SALT LAKE CITY, UT 84130  
(800) 955-7070

Balance: \$0  
Date Verified: 04/2010  
High Balance: \$6,062  
Collateral: SLDTO PORTFOLIO RECOVERIES ASSOCIATE  
Credit Limit: \$5,000

Pay Status: PAYMENT AFTER CHARGE OFF/COLLECTION  
Account Type: REVOLVING ACCOUNT  
Responsibility: INDIVIDUAL ACCOUNT  
Date Open: 01/2006  
Date Closed: 11/2009

Loan Type: CREDIT CARD

Estimated date that this item will be removed: 09/2016



Consumer Credit Report for JAMES E. WRIGHT JR.

File Number: 236408935  
Page: 2 of 2  
Date Issued: 06/09/2011

[REDACTED]

[REDACTED]

TNB-VISA #435237172522\*\*\*\*

POB 673  
MINNEAPOLIS, MN 55440-0673  
(888) 755-5856

Balance: \$4,557  
Date Verified: 06/2011  
High Balance: \$4,556  
Credit Limit: \$3,800  
Past Due: >\$4,557<

Pay Status: >CHARGED OFF AS BAD DEBT<  
Account Type: REVOLVING ACCOUNT  
Responsibility: INDIVIDUAL ACCOUNT  
Date Open: 02/2007  
Date Closed: 03/2010

Loan Type: CREDIT CARD  
Remarks: ACCT CLOSED BY CREDIT GRANTOR  
Estimated date that this item will be removed: 08/2016

[REDACTED]

[REDACTED]

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website <http://disclosure.transunion.com>

000000



EXHIBIT K-3

**CREDIT FILE: June 13, 2011**  
**Confirmation # 1151004417**

**Your request for Equifax to reinvestigate certain items of your credit file is now complete**

Below are your results and a report of your credit file revised, as applicable, as a result of the reinvestigation. If you have additional questions regarding the reinvestigated items, please contact the source of that information directly. You may also contact Equifax regarding the specific information contained within this letter or report within the next 60 days by visiting us at [www.investigate.equifax.com](http://www.investigate.equifax.com).

**Thank you for giving Equifax the opportunity to serve you**

**Credit Account Information**

(For your security, the last 4 digits of account number(s) have been replaced by X. (This section includes open and closed accounts reported by credit grantors).)

Credit Account Information		
(For your assembly, the last 4 digits of account number(s) have been replaced by * (This section includes open and closed accounts reported by credit grantors)		
Account History	1 : 30-59 Days Past Due 2 : 60-89 Days Past Due 3 : 90-119 Days Past Due 4 : 120-149 Days Past Due	5 : 150-179 Days Past Due 6 : 180 or More Days Past Due G : Collection Account H : Foreclosure
Status Code		J : Voluntary Surrender K : Repossession
Descriptions		L : Charge Off

**>>> We have researched the credit account. Account # - 43523717522\* The results are:** Equifax verified that this item belongs to you. Additional information has been provided from the original source regarding this item. If you have additional questions about this item please contact: **Target National Bank, C/O Target Credit Services, Minneapolis MN 55440-9475**

Target National Bank CO TARGET CREDIT SERVICES Minneapolis MN 55440-9475  
Account Number:

Item's As of	Balance	Date Reported	Amount	Amount	Date of	Least Payment	Actual	Scheduled	Date of 1st	Date of	Date Mat.	Charge Off	Delinquency	Del. 1st Paid	Months Paid	Activity	Designator	Creditor Classification
06/2011	\$4,556		\$4,556		08/2009	\$0		\$0	09/2009		03/2010	\$0						
<b>Status - Charge Off: Type of Account - Revolving; Type of Loan - Credit Card; Whose Account - Individual Account; ADDITIONAL INFORMATION - Charged Off Account; Account Closed By Credit Grantor; Credit Card;</b>																		
<b>Account History</b> 03/2010																		
<b>With Status Codes</b> L																		

Status - Charge Off; Type of Account - Closed By Credit Grantor; Credit Card;

**Account Number:** 000000 - Charged Off Account; Account

**Account History** 03/2010  
**with Status Codes** L

(Continued On Next Page)

Page 1 of 2

1151004417APP-000988181-706 - 3731 - AS

\_\_\_\_\_

000706

000988181-706  
James E Wright  
416 Tichicon Ave  
Quakertown, PA 18951-1343

P. O. Box 105518  
Atlanta, GA 30348

EXHIBIT L-1

**Notice to Consumers**

You may request a description of the procedure used to determine the accuracy and completeness of the information, including the business name and address of the furnisher of information contacted, and if reasonably available the telephone number.

If the reinvestigation does not resolve your dispute, you have the right to add a statement to your credit file disputing the accuracy or completeness of the information; the statement should be brief and may be limited to not more than one hundred words (two hundred words for Maine residents) explaining the nature of your dispute.

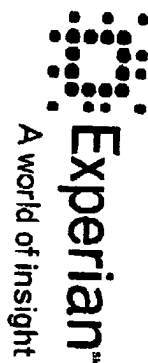
If the reinvestigation results in the deletion of disputed information, or you submit a statement in accordance with the preceding paragraph, you have the right to request that we send your revised credit file to any company specifically designated by you that received your credit report in the past six months (twelve months for California, Colorado, Maryland, New Jersey and New York residents) for any purpose or in the past two years for employment purposes.

EXHIBIT L-2

JUN-18-2011 04:17 PM JAMES.WRIGHT

215 538 6128

P.01



Prepared for: **JAMES E WRIGHT JR**  
Date: **June 13, 2011**  
Report number: **1908-6342-84**

Page 1 of 6

**Dear JAMES E WRIGHT JR,**

*To assist you in understanding your correction summary, we have provided additional information that relates directly to items on your personal credit report.*

**TARGET NATIONAL BANK**  
435237472522.....  
**PLEASE CONTACT CREDIT GRANTOR AT -8887555556-**

According to the Fair Credit Reporting Act (FCRA), a national consumer credit reporting company's role in the dispute process is to investigate information to determine the accuracy and completeness of any disputed item by contacting the source of the disputed information and informing them of all relevant information regarding the consumer's dispute. If the issue is not resolved, then the consumer credit reporting company must offer to include a consumer statement on the personal credit report. The Federal Trade Commission (the government agency charged with enforcement of the FCRA) does not require that the consumer credit reporting company obtain documentation such as the actual signed sales slips, signature cards, contracts, etc., nor does it require that consumer credit reporting companies act as mediators or negotiators in account disputes.

Sincerely,

Experian  
NCAC  
P.O. Box 2002  
Allen TX 75013

PO Box 9701  
Allen, TX 75013



0008156 01MB 0387 \*\*AUTO S 0 7196 18951-134316 -C01-P08164-I  
JAMES E WRIGHT Jr  
416 TOHICKON AVE  
QUAKERTOWN PA 18951-1343



0158888971

JUN-18-2011 04:19 PM JAMES.WRIGHT

EXHIBIT M-1

215 538 6128 P.01 7196-01-00-0008156-0001-0012122

7196-01-00-0008156-0002-0012121

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

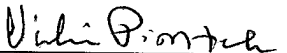
JAMES E. WRIGHT, JR.	:	CIVIL ACTION
	:	
V.	:	
	:	
TARGET NATIONAL BANK;	:	11-CV-04241
JOHN DOES 1-10; AND X, Y, Z	:	
CORPORATIONS	:	

**Certificate of Service**

On the 22nd day of July, 2011, I sent a true and correct copy of the attached amended complaint upon the following parties at the following addresses.

Daniel D. Krebbs, Esquire  
1845 Walnut Street  
Philadelphia, P A 19103

FAEGRE & BENSON LLP  
Brian Melendez, Esquire  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

  
Vicki Piontek, Esquire  
Attorney for Plaintiffs  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
palaw@justice.com  
Fax: 866-408-6735

7.22.2011  
Date